

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, *et al.*,

Plaintiffs,

v.

THE STATE OF TEXAS, *et al.*,

Defendants.

Civil Action No. 5:21-cv-844 (XR)
(Consolidated Cases)

**UNOPPOSED MOTION FOR ENTRY OF STIPULATED CONFIDENTIALITY AND
PROTECTIVE ORDER REGARDING PRODUCTION OF ULTRASENSITIVE
INFORMATION**

Plaintiffs La Unión Del Pueblo Entero, Friendship-West Baptist Church, the Anti-Defamation League Austin, Southwest, and Texoma Regions, Southwest Voter Registration Education Project, Texas Impact, Mexican American Bar Association of Texas, Texas Hispanics Organized for Political Education, Jolt Action, William C. Velasquez Institute, FIEL Houston Inc., and James Lewin (collectively, the “LUPE Plaintiffs”) respectfully move for entry of the attached Stipulated Confidentiality and Protective Order Regarding Production of Ultrasensitive Information between the private plaintiffs and the county election official defendants in the above-captioned consolidated litigation (collectively, the “Parties”) under Federal Rule of Civil Procedure 26(c) and Local Rule CV-26. The Parties have met and conferred and anticipate production of sensitive, private, personal and confidential electronically stored information concerning non-party Texas residents in the course of this action.

Good cause exists to enter the Stipulated Confidentiality and Protective Order to expedite discovery, protect sensitive and confidential information, enable the Parties to prepare for

dispositive motions and trial, and address the handling of confidential material during and after the conclusion of this litigation. The Parties have stipulated to entry of the Confidentiality and Protective Order, and the United States, the State Defendants, and the county district attorney defendants do not oppose this motion for entry. Accordingly, the LUPE Plaintiffs respectfully request entry of the Stipulated Confidentiality and Protective Order.

DATE: March 28, 2022

Respectfully submitted,

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CERTIFICATE OF CONFERRAL

Pursuant to Local Rule CV-7(G), I hereby certify that on March 24, 2022, I conferred by email with counsel for the United States, the State Defendants, and the county district attorney defendants regarding this motion for entry. The United States, the State Defendants, and the county district attorney defendants do object to entry of the proposed Stipulated Confidentiality and Protective Order.

/s/ Patrick A. Berry

Patrick A. Berry

CERTIFICATE OF SERVICE

I hereby certify that on March 28, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of this filing to counsel of record.

/s/ Patrick A. Berry

Patrick A. Berry